



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 30, 2017

BY HAND and ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Chambers 1020
New York, New York 10007

**Re: *United States v. Walters,*
 S1 16 Cr. 338 (PKC)**

Dear Judge Castel:

The Government respectfully submits this letter to explain the redactions the Government has made in the public filing of the Government's Opposition to the Defendant's Motion to Dismiss the Indictment, as well as the minor redactions in the version of the brief provided to the defendant.

With respect to the publicly-filed version of the brief, the Government has redacted Rule 6(e) material, including information pertaining to the grand jury's investigation, information relating to uncharged individuals and related entities, as well as information relating to the wiretap. With respect to the version of the brief provided to the defendant, the Government has redacted references to uncharged individuals and related entities. Pursuant to the Court's Rule 6(e)(3)(E)(ii) Order today, however, we have not redacted information considered by the grand jury in this case, in order to enable the defendant to participate in the remedy stage of this proceeding.

In addition, the Government has not publicly filed the three exhibits to its brief. These exhibits are comprised of either grand jury materials or documents referencing uncharged

individuals and trading. These exhibits will, however, be produced to the defendant in their entirety, pursuant to the terms of the Protective Order in this case and Your Honor's Rule 6(e)(3)(E)(ii) Order, signed earlier today.

Respectfully submitted,

PREET BHARARA
United States Attorney

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